

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

**IN RE: ETHICON, INC. PELVIC  
REPAIR SYSTEM PRODUCTS  
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02327  
MDL No. 2327**

**THIS DOCUMENT RELATES TO:**

**JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE**

*Ida Evans*  
*2:12-cv-01225*

*Rose Gomez*  
*2:12-cv-00344*

*Jeanie Holmes*  
*2:12-cv-01206*

*Mary Jane Olson*  
*2:12-cv-00470*

*Christine Wiltgen*  
*2:12-cv-01216*

*Kathleen Wolfe*  
*2:12-cv-00337*

*Monica Freitas*  
*2:12-cv-01146*

*Denise Sacchetti*  
*2:12-cv-01148*

*Sheri Scholl*  
*2:12-cv-00738*

*Cindy Smith*  
*2:12-cv-01149*

*Waynick, Laura*  
*2:12-cv-01151*

*Denise Burkhart*  
*2:12-cv-01023*

*Jo'Ann Lehman*  
*2:12-cv-00517*

*Patricia Conti*  
*2:12-cv-00516*

*Patricia Ruiz*  
*2:12-cv-01021*

*Pamela Free*  
*2:12-cv-00423*

*Melissa Ridgley*  
*2:12-cv-01311*

*Marty Babcock*  
*2:12-cv-001052*

*Dorothy Baugher*  
*2:12-cv-01053*

*Patti Ann Phelps*  
*2:12-cv-01151*

*Lisa Thompson*  
*2:12-cv-01199*

*Rebecca Wheeler*  
*2:12-cv-01088*

*Thelma Wright*  
*2:12-cv-01090*

*Rocio Herrera-Nevarez*  
*2:12-cv-01294*

*Debra A. and Donald Schnering*  
*2:12-cv-01071*

*Rebekah Bartlett (Pratt)*  
*2:12-cv-01273*

*Amanda Deleon*  
*2:12-cv-00358*

***Karyn Drake***  
***2:12-cv-00747***

***Paula Kriz***  
***2:12-cv-00938***

***Stacy Shultis***  
***2:12-cv-00654***

***Kimberly Thomas (Wyatt)***  
***2:12-cv-00499***

***Patricia Tyler***  
***2:12-cv-00469***

***Myndal Johnson***  
***2:12-cv-00498***

***Beverly Kivel***  
***2:12-cv-00591***

***Karen Bollinger***  
***2:12-cv-01215***

***Virginia Dixon***  
***2:12-cv-01081***

***Shirley Walker***  
***2:12-cv-00873***

***Dawna Hankins***  
***2:12-cv-00369***

***Wilma Johnson***  
***2:11-cv-00809***

***Margaret Kirkpatrick***  
***2:12-cv-00746***

***Harriet Beach***  
***2:12-cv-00476***

***Holly Jones***  
***2:12-cv-00443***

**UNOPPOSED MOTION FOR A FOURTEEN-DAY EXTENSION  
OF TIME IN WHICH TO FILE ANY *DAUBERT* MOTION  
RELATED TO DEFENSE EXPERT STEVEN MACLEAN**

Plaintiff respectfully moves this Court for an order granting a fourteen-day extension of time in which to file any *Daubert* motion in the above captioned case against Steven MacLean. Dr. MacLean has been designated as a general expert in each of those cases listed in the caption. Plaintiffs' counsel requested an extension from Defense counsel after being served with a supplemental expert report a few days before his deposition was initially scheduled to commence. In light of the new testing detailed in his supplemental report, Dr. MacLean's deposition was postponed so Plaintiffs could adequately prepare. Dr. MacLean's deposition is now scheduled on April 11, 2016. Defense counsel for Ethicon has agreed to the extension detailed below.

The requested extension would move the applicable deadlines to the following dates:

*Daubert* motion:

- Initial filings due May 5, 2016
- Responses due May 19, 2016
- Replies due May 26, 2016

These extensions are not sought for reason of delay or for any other improper purpose. They are the first extensions requested for this brief.

WHEREFORE, Plaintiffs request that the Court grant the requested extensions, moving the due dates to the dates listed above.

Dated: April 4, 2016

Respectfully submitted,

/s/ Bryan F. Aylstock

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

[rbaggett@awkolaw.com](mailto:rbaggett@awkolaw.com)

[baylstock@awkolaw.com](mailto:baylstock@awkolaw.com)

/s/Thomas P. Cartmell

Thomas P. Cartmell, Esq.

Jeffrey M. Kuntz, Esp.

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

[tcartmell@wcllp.com](mailto:tcartmell@wcllp.com)

[jkuntz@wcllp.com](mailto:jkuntz@wcllp.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document on April 4, 2016, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Bryan F. Aylstock  
**Attorney for Plaintiffs**